

Exhibit H

Stan R. LaPointe

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al

**AFFIDAVIT OF
STAN R. LAPOINTE**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF MAINE)

: SS.:

COUNTY OF KENNEBEC)

STAN R. LAPOINTE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 682 China Road, Winslow, Maine 04901.

2. I am currently 68 years old, having been born on May 23, 1954.

3. I am the brother of John Paul LaPointe, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. John passed away from liver cancer on August 8, 2016. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. John was my big brother. He was four years older and very protective of me. I idolized him and tried to emulate everything he did. We enjoyed being together and going camping, fishing and hunting. Remarkably, we followed similar career paths as well. After John started teaching, I taught for a year as well. Realizing that teaching wasn't really lucrative, we both became ironworkers. We traveled all over the country putting up buildings. John had two

passions – football and being an ironworker. I lived with my brother for years while we were working in construction.

6. My brother was one tough individual. To his credit, John was an unbelievable football player. He played as a defensive end. In fact, while John wasn't drafted, he was a walk-on for the Cincinnati Bengals, which was pretty neat. Following some broken ribs, John came home but always remained passionate for the game.

7. My brother was also very passionate about his country. John lived in Detroit on 9/11. The minute he heard about the terrorist attacks, he packed up his bags, jumped in his car, left the job he was working on, and headed to New York. He was one of the first 300 people to show up to respond, and he never went back to Detroit full time until it was all done.

8. Around November 2001, I was coaching the Winslow High school football team. In the middle of a championship game, John showed up to visit. When I saw him on the sidelines, I could tell that he didn't look the same. There was a profound sadness in his eyes. This was foreign to me because he was always a jovial guy.

9. After 9/11, my brother showed up at the World Trade Center and declared that he was there to help in any way he could. No one ever issued a warning saying you might get sick. My brother became part of the larger crew helping to clean up the carnage. Based on some details John shared with me, and from pictures I discovered later at his home, it was evident that anyone working on that pile was quite distressed from their work. In the process of clearing debris, John saw human remains and dismembered bodies. This wreaked havoc on his psyche, but he stayed because he was a true patriot.

10. John was always a fit guy, weighing about 230 lbs. of sheer rock. In about 2005, I noticed John was losing weight. My brother must have been ill for some time. When our father was in hospice, John would come and listen and speak with the hospice nurse. However, he stopped doing that. At first, I thought he was just tired. However, on the day before our father died, I knew it was much more than that. John pulled me aside and asked if I would handle everything regarding our father's estate. I had thought that because he was the oldest he would step up and take care of everything. He said that he just couldn't do it. He stressed to me, however, that I should do the right thing and make sure everybody gets whatever is appropriate. Looking back, there's no doubt in my mind that John felt too overwhelmed with his own health

issues to manage our father's affairs.

11. I became somewhat more involved in my brother's care after he had difficulty refilling an out-of-state prescription. Unable to find appropriate care in the countryside, I took John to the Lahey Medical Center near Boston. Within fifteen minutes, the doctor came out and informed me that John would need to remain in the hospital. The doctor quickly inquired as to whether John was at 9/11, noting he had seen many similar cases among the 9/11 community. Sadly, the doctor advised me that there were no treatments available to John because his cancer was too advanced. I was shocked and devastated.

12. I could see John was experiencing so much pain and discomfort. There were times where he felt he couldn't bear to live another day. To help ease the pain, I tried to find natural remedies wherever possible. We tried Rick Simpson oils and cannabis, which could be turned into a paste and fed to John on a cracker. It afforded him some relief from the pain, but it was always just a short, temporary fix. I would have done anything for my brother to ease his pain. It was so difficult to watch the strong, prideful man I knew become a shell of himself and suffer terribly due to this undeserved illness. I wasn't able to share the extent of John's suffering with my mother, who was already very anxious about his medical condition.

13. The reality is that after the terrorist attacks of 9/11, the government lied about the severe health risks connected with work in the World Trade Center area. Nevertheless, even had the risks been fully disclosed, my brother would have still been glad to volunteer. I know many people would have changed their mind, but John was primarily interested in serving his country in a time of need and helping his fellow man. In order to help preserve his contribution to the relief effort, my brother's name is written on the cross exhibited at the National 9/11 Memorial Museum. It comforts me to know that he will never be forgotten.



STAN R. LAPOINTE

Sworn to before me this
13th day of May, 2022



Notary Public

Anthony Paul Leon

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

AFFIDAVIT OF
ANTHONY PAUL LEON

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY)
 : SS.:
COUNTY OF BERGEN)

ANTHONY PAUL LEON, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 115 Thornbury Avenue, Glen Rock, New Jersey 07452.

2. I am currently 47 years old, having been born on September 22, 1974.

3. I am the son of Angel Leon, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from bile duct cancer on May 3, 2017. It was medically determined that this illness was causally connected to his exposure to toxins resulting from the September 11, 2001 terrorist attacks.

5. Angel was a great father, very loving, and a hard worker. My dad taught me how to be a man. Despite a divorce with my mother, my father always made decisions to be close and be a part of my life. Dad always helped guide me with my career and make the best decisions possible. My dad had just recently retired before he passed away. We were very

excited to share in this time of his life since he had just moved from Pennsylvania to a retirement community in my hometown, quite literally within a few minutes of my home. Had it not been for his illness, this would have been ideal because he would be able live so close to me and my daughters.

6. Sadly, the day we moved him into his new home in Glen Rock, New Jersey, he wasn't feeling well and was diagnosed. At first, my father tried to complete the move; however, after the last box was moved in, he insisted that he needs to go the hospital, at which point, I took him to the Emergency Room, where the doctors completed CAT scans and other tests. Later that day, I was informed that my father had cancer. Since it was only less than one month from the time my dad moved to the time of his death, he hadn't even finished unpacking. It all happened so fast. I felt like I was robbed of my time with him.

7. My father loved to help people. He had been working for the state of Pennsylvania in a program that assisted people locate employment. My father was working for Moody's Investor Service for a very long time and had a long career in information technology. In fact, this inspired me to enter the IT field myself.

8. My father was working for Travelers Insurance Company near the vicinity of the World Trade Center at the time of the attacks on September 11, 2001. At the time, I was working in midtown Manhattan and recall it being extremely chaotic and difficult to contact my father at that time. I wasn't able to reach him right away because cell phones were a mess that day. Later, I learned that my dad went to stay with my Aunt in the Bronx. When I spoke with my Aunt, she told me that his clothes were covered in dust. Since the building where Travelers had its office remained intact, my dad continued to work in the area into 2002, and possibly even longer thereafter.

9. My father was diagnosed right after he moved to Glen Rock, NJ. Again, there was only a brief period between his diagnosis and his death; although, he later told me that he had some physical symptoms before we took him to the Emergency Room. Specifically, my father complained that he had not gone to the restroom in 2-3 weeks, which created severe bloating and stomach pain. I noticed a number of other symptoms before his diagnosis, including low energy, irritability, and difficulty getting up after sitting down. Just to be clear, it was only about

30 days from the time my dad was diagnosed until he passed away on May 3, 2017. My father had gone for regular checkups and other medical appointments in the years before his diagnosis, which made it all the more painful and surprising to suddenly learn of my dad's cancer. Ultimately, this makes me wonder if the cancer had developed quickly or if he had been living with it undetected for many years.

10. My daughters were very young at the time my father was diagnosed, maybe only 5 to 7 years old. However, they were mature enough to understand that it was such a painful time for me because my eldest daughter remembers, "the one and only time I've seen you cry was when grandpa passed away." One of the most painful things about my father's cancer was feeling so devastated that my family and I were finally about to have the opportunity to spend more quality time with him, through his retirement and move to Glen Rock, and it was all just stripped away. Over the last several years, it's been particularly painful living in Glen Rock, a relatively small town, and regularly passing my father's new home so close to my house and nearby where I treat my daughters to pizza for lunch all the time.

11. Once my dad was diagnosed, I took a lot of time off from work to help take care of him. Since I am an only-child, and my father was divorced and lived alone, all of the responsibility for my dad and his affairs fell on me personally.

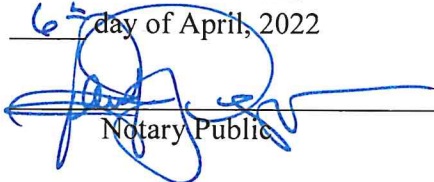
12. I still have vivid memories of accompanying my dad to the hospital for diagnostics and treatment. In particular, I remember sitting in the oncologist's office with my dad after the MRI and CAT scans were complete, thinking about the treatment that lies ahead. Unfortunately, the oncologist informed us that my father had bile-duct cancer, which was an extremely rare form of cancer that is also very hard to treat. It was extremely difficult to obtain proper services for my father, even hospice care. In the last couple of weeks before his death, I found my dad on the floor, and it was too difficult for me to physically transfer him back to the bed. Consequently, I had to take him back to the hospital, where he was mostly unresponsive and

on constant painkillers. Nobody should have to needlessly go through such a tragic experience.



ANTHONY PAUL LEON

Sworn to before me this
6th day of April, 2022



Notary Public

PAUL J. DUGGAN
NOTARY PUBLIC OF NEW JERSEY
ID # ~~2306~~758
My Commission Expires May 25, 2025

Jeffrey M. Loughery

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al,

AFFIDAVIT OF
JEFFREY M. LOUGHERY

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF RICHMOND)

JEFFREY M. LOUGHERY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 359 Neal Dow Avenue, Staten Island, New York 10314.

2. I am currently 55 years old, having been born on May 29, 1966.

3. I am the son of Michael John Loughery, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father died from metastatic prostate cancer on October 23, 2017. It was medically determined that this illness was causally related to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father was involved in every aspect of my life. Sports was a big bonding activity for us. When I was little, my dad coached my little league team. When I was older, both my father and I loved golf and would often play together. When I made the decision to follow in his footsteps and become a police officer, my father was a great guide for me. I frequently turned to him for advice about the job and how to handle certain situations. He was always happy to share his knowledge with me. My dad also loved being a grandfather and truly adored his

grandsons. Once my sons were old enough, my dad and I would take them on fishing trips together. He was very involved in his grandkids' lives.

6. On 9/11, my father had already retired from the NYPD, but he remained a member of the reserves as a squad sergeant. He assisted at the Staten Island landfill with other reserves, sifting through debris. He helped the NYPD detectives identify missing persons as they were extremely overwhelmed. Afterwards, my father helped out at Floyd Bennett Field and Miller Field, and also ran security at two locations near the World Trade Center. He did all this for several months following the attacks.

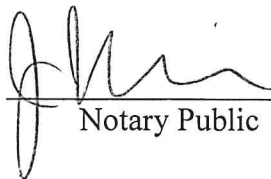
7. I learned of my dad's illness through my mother. She called me and my siblings for a family meeting and laid it all out for us. We went over what my father's treatments would look like and how we could help. This impacted my life greatly. As a first responder myself, I knew a lot of people would get sick, both responders and civilians. I never dreamed it would actually happen to my father. It's still chilling to know that something like this could even happen.

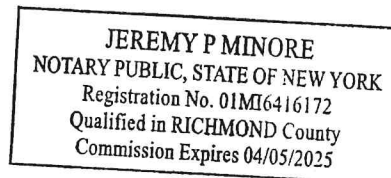
8. I helped with my father as much as I could. I often took him to different doctor appointments and chemotherapy treatments. I tried to help both of my parents in any way they needed me to, whether it was running errands or helping around the house.

9. I will never forget my father. His memory is seared into my mind forever. It was such a terrible loss for me. I idolized my father. I miss him so much, especially when I'm on the golf course or at functions for the National Law Enforcement Associates. My sons are missing out on all they could have learned from him. My dad was a bigger-than-life gentle giant who was happy to help others and was loved by everyone who had the privilege to know him.


JEFFREY M. LOUGHERY

Sworn to before me this
21st day of April, 2022


Notary Public



Kathleen Loughery

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF
KATHLEEN LOUGHERY**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

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STATE OF HAWAII)
 : SS.:
COUNTY OF HAWAII)

KATHLEEN LOUGHERY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 82-6274 Kahauloa Road, Captain Cook, Hawaii, 96704 (PO Box 2169, Kealahakua, Hawaii, 96750).

2. I am currently 57 years old, having been born on June 27, 1964.

3. I am the daughter of Michael John Loughery, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father died of prostate cancer on October 23, 2017. It was medically determined that this illness was causally connected to his exposure to toxins resulting from the September 11, 2001 terrorist attacks.

5. I had an extremely close relationship with my father. Before moving to California and later Hawaii, I was living in Manhattan and would meet him frequently. He was my rock, my go-to person, and he would always be there for whatever I needed in terms of wisdom, counsel, guidance, and life experience. While there was a physical distance, we still spoke on the phone all the time. We would have different conversations that were quite intense, which I always treasured because my dad was a man of extraordinary values and my moral center. My

relationship with my dad was slightly more intense than my siblings because the time with him was more concentrated. Since my daughter was only two years old at the time of my father's diagnosis in 2007, it was tricky to coordinate travel to see him as his condition progressed. It was an excellent relationship, and I wouldn't be where I am today if my dad hadn't been there as my rock.

6. My father was retired from the NYPD and was working in lower Manhattan. He was reactivated from retirement to active duty after September 11, 2001. He carried the burdens of being employed in two capacities post-retirement that involved dealing with the 9/11 crisis, which included recovering equipment for private businesses as well as relief efforts with the NYPD. One of the critical responsibilities my father had with the NYPD was his work at Miller Field in Staten Island. As an objective observer, I don't know how people can deal with such emotionally impactful work. This was stuff nobody had encountered before. He was sifting through debris for bone fragments for the remains of human beings. It was really important for my dad to make sure that every bit of person was handled with dignity and care as he contributed to the body identification effort to inform the families and give them closure. My dad didn't just do his job, he had a value system that was attached to his career that was extraordinary. Observing my dad and hearing about his work taught me a level of endurance that I didn't even know existed. For any of the families that were impacted from 9/11, what's incredible is that we're still in it.

7. With my dad's illness, I noticed physical changes early on because I was not around his home in New Jersey as often. It's easier to observe those types of shifts with a stretch of time in between them. The diagnosis came through in 2007, when my daughter, Noelani, was only two. I adjusted my life to spend as much time as I could with my dad, bringing Noelani whenever possible, so that she would see her grandfather as much as possible. In the years after 9/11, the changes in my dad were readily apparent. I could see how the changes affected him.

8. My father's diagnosis and passing were particularly difficult for me, as I was a new parent and was raising my daughter on my own. Again, Noelani was so young when my dad was diagnosed. My ex was a full Hawaiian, which I hoped would be a favorable social experiment but ultimately didn't work, which meant I was essentially alone with my daughter.

This was a particularly hard time for me because I worried that I might not have the opportunity to benefit from my dad's wisdom as a parent when I really needed it.

9. When my dad was diagnosed, I wanted to leave Hawaii; however, my dad said "no." I think that was the right advice because ultimately my daughter needed exposure to the connection she has to her home. Also, my dad didn't want to be a burden...he just wanted to go on with his life. He would celebrate when his tumor marker numbers were good and encouraged me to move forward in my life as much as possible. In retrospect, being nearby, my sister and brother absorbed an incredible burden. I regret not being there but ultimately, I listened to my dad who always did the right thing.

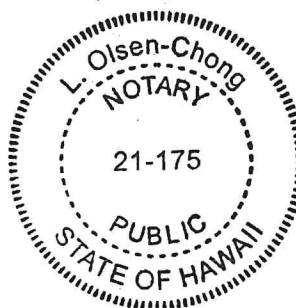
10. My father's declining health and death had a huge financial impact on me. Dad taught us all to be self-sufficient, but his death impacted me by virtue of the fact that he had knowledge of things of a practical nature that I lacked. When dad was gone, I really felt all alone without him as a confidante to help me navigate through the complexities of being a parent. For example, planning for retirement or a college fund for my daughter was more of an afterthought and I would have benefited from his advice. I did my best to follow his advice, but the more symptoms that developed as time went on, it became harder to burden him with my realities, and I made some mistakes in those areas.

11. There is a suddenness of the deaths that occurred on 9/11, which has its own level of grief for the families. However, there is also grief for the families who lost a loved one that was exposed to the horrors of 9/11 and whose death was delayed. Either way, the grief is equally relevant. My family's grief is painful because, while we have a little more time with our loved one, we all know that the inevitable is inescapable. Our grief is just as deep, just as hard, and just as harsh. For me, it was clear that there were dangers connected to that debris and nobody fully understood with what they were dealing. To me, it was obvious there would be ramifications, but all we could do is monitor things as best we could.


KATHLEEN LOUGHERY

Sworn to before me this
11th day of April, 2022


Notary Public



State of **Hawaii**County of Hawaii }On 4-11-22, before me, L. Olsen-Chong,
(here insert name of notary)personally appeared Kathleen Loughery
(name(s) of Signer(s))

personally known to me (or proved to me on the basis of satisfactory evidence) to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

Signature L Olsen Chong (SEAL)My Commission Expires: 12-12-25

This area for Official Notarial Seal

NOTARY PUBLIC CERTIFICATION

Doc. Date: 4-11-22# Pages: 4Notary Name: L. Olsen-ChongJudicial Circuit: ThirdDoc. Description: Affidavit ofKathleen LougheryNotary Signature: L Olsen ChongDate: 4-11-22

ALL PURPOSE ACKNOWLEDGMENT

Mary Elizabeth Loughery

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOANNE T. ALCABES, et al.,

Plaintiffs,

**AFFIDAVIT OF
MARY ELIZABETH
LOUGHERY**

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY)
 : SS.:
COUNTY OF OCEAN)

MARY ELIZABETH LOUGHERY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 12 Crooked Stick Road, Jackson, New Jersey 08527.

2. I am currently 80 years old, having been born on October 18, 1941.

3. I am the wife of Michael John Loughery, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On October 23, 2017, my husband Michael passed away from prostate cancer. It was medically determined that this illness was causally connected to his exposure to toxins resulting from the September 11, 2001 terrorist attacks.

5. My husband and I were married for 54 years and had moved from Staten Island to an adult golf community in New Jersey. We traveled together, had a great group of friends, and were very social. Michael was my best friend and together we enjoyed many things, including trips into the City to see plays, as well as celebrations and family gatherings, which were so

essential to him.

6. Michael had already retired from the NYPD on September 11, 2001, but they reactivated all of the retirees. He was placed on a bus and went right down to Ground Zero. After spending a number of days at Ground Zero, Michael was assigned to work at Miller Field, where he would sift through debris from the World Trade Center looking for any indication of human remains. Prior to retiring from the police force, Michael was working for a security company that had a number of clients, including Deutsche Bank and others, in the Ground Zero area. After the dust had settled a bit, one of his responsibilities was to go around and confiscate the computers that remained in buildings damaged around the site, requiring him to return to Ground Zero for quite a while.

7. In 2007, Michael went for a regular physical and his PSA numbers were very high. He was diagnosed with prostate cancer. Up until that time he was a healthy man. My husband continued to see a doctor at Columbia Presbyterian, who performed a radical prostatectomy. This required multiple trips into the City as his cancer progressed so that the doctor could monitor and treat Michael's illness. He was fine for a few years until the cancer reared its ugly head again.

8. Seeing my husband have to go in for such significant medical treatment was extremely painful and stressful. It's very difficult when you know down the road you are going to lose someone you really love and had cared for so many years. We kept going, and we tried to go out and play golf. Michael fought as hard as he could. He didn't complain much but it was very difficult, especially when he needed additional support for walking and started to use a rollator, and later a wheelchair for the last couple of months before he passed away.

9. Fortunately, Michael and I had decent medical coverage. Also, Michael was accepted into a clinical trial when he started radiation treatments, which shortened some of the traveling for my husband's care. I would drive with Michael to the Robert Wood Johnson Medical School in New Brunswick, New Jersey, so that the specialist there could take care of him and monitor his illness. Worrying about constant monitoring, doctor visits and treatments was very impactful.

10. Michael would have had a much longer life had it not been for the tragedy of 9/11. Unfortunately, my husband missed so many of our wonderful family events in the years

that followed. He missed the chance to see his grandchildren growing up, graduations, as well as family traditions. His loss is felt deeply, as he was so well respected among his friends and family members. I still miss him so much.


MARY ELIZABETH LOUGHERY

Sworn to before me this
6 day of April, 2022


Notary Public



Susan Mary Loughery

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF
SUSAN MARY LOUGHERY**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY)

: SS.:

COUNTY OF MONMOUTH)

SUSAN MARY LOUGHERY EVANOWSKI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3116 Truman Court, Wall, New Jersey, 07719.

2. I am currently 52 years old, having been born on December 31, 1969.

3. I am the daughter of Michael John Loughery, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from prostate cancer on October 23, 2017. It was medically determined that this illness was causally connected to his exposure to toxins resulting from the September 11, 2001 terrorist attacks.

5. I was very close to my father. When I was younger, he worked the night shifts. So, when my mom was working, I would spend a lot of one-on-one time with my dad during the day. He took me to visit colleges and helped me decide which one to attend. While I was in college and waitressing, my dad would come in and visit me at work to talk. When I moved to New Jersey and my parents were considering the next phase of their lives, they wanted to live in a golf community. I helped them find a new home that was near my house so that the families

would be closer. This was a real pleasure because it allowed us to spend more times together. Often, my husband would golf with my dad and then we would meet and have dinner with my parents and my children. Since my commute to Trenton is about an hour long, I would call my parents while traveling and that time became an important part of staying connected as a family. As my dad needed a lot more care towards the end of his life, it was important that my husband and I lived close by so that we could support my mom and help both of them through the difficult time.

6. My dad, having been retired from the NYPD, was reactivated to support the City's relief effort after September 11, 2001. He was also helping the security companies that he worked for gain access to Ground Zero and provided support in two different lines of effort. He assisted companies to recover data from equipment at Ground Zero and for the City. He also worked at Miller Field sifting through debris to try to locate any human remains. My dad told me that the trucks would come through and there would be an assembly line formed to establish a methodical review of the content that was coming through because of the remains and human lives that were mixed within the debris. For my dad, as well as fellow officers, it was an act of humanity for them to sift through and to find any shred of evidence of a loved one, including people that we knew. This was important for friends, family, and neighbors who were counting on people like my dad, sifting through the debris, to give them something that is of their loved ones.

7. In around 2007, when I was at one of my children's events, I received word that my father had cancer. This caught my family and me completely off guard because my dad had gone for regular physicals and testing, which he had done only a few months before. His most recent prior visit didn't reveal any sign of cancer, but was suddenly very pronounced. Since I knew of some folks that had received very good care at Columbia, I began to research some doctors that my mom and I could contact. This became a complicated process as we began to consider which providers were covered by insurance, treatment options, as well as logistics of traveling to various treatment centers from my parents' home in Jackson, New Jersey. Ultimately, the medical team at Columbia was effective and extended care that was reassuring and compassionate.

8. Seeing my dad battle with cancer over so many years was an extremely stressful period of my life. My dad would keep me informed about his tumor marker numbers on a regular basis. There were times when the numbers would decrease and others when they would increase, creating an emotional roller coaster. A turning point was when my dad called and informed me that he was giving up golf because he was in too much pain. That was particularly hurtful because golf was something he loved so much.

9. Decisions concerning my dad's medical care were never easy. We tried to make sure he had the most effective treatment since he wanted to fight the cancer as best he could. We were also fortunate to have him participate in a clinical trial. I would frequently take off work because taking my dad to treatments required so much traveling to and from the City. Wading through the insurance paperwork and helping my parents understand the Explanation of Benefits letters created a tremendous amount of pressure; although, looking back I'm glad I was able to help support my family as best that I could.

10. My dad was the center of our family, and his struggle with cancer and passing crushed us. I was blessed to have Michael as my dad and to have the time we had together. I can't help but cry thinking about my children moving forward in their lives and how my father isn't here to see them continue to grow. Currently, my oldest son, Jake, is getting ready for college and my middle son, JD, is graduating from grammar school. I know my dad would be proud of them. My youngest child, Erin, is in third grade and does not have as many memories of her grandfather. I wish that were different. I love my dad and miss him every day.


SUSAN MARY LOUGHERY EVANOWSKI

Sworn to before me this
8th day of April, 2022


Notary Public

CAROLYN M. LAPAUGH
NOTARY PUBLIC OF NEW JERSEY
COMMISSION EXPIRES 3/25/2023



Andréa Marie Marcucci

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF
ANDRÉA MARIE MARCUCCI**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF QUEENS)

ANDRÉA MARIE MARCUCCI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 212-30 23rd Avenue, Apt. 1F, Bayside, New York 11360.

2. I am currently 52 years old, having been born on September 12, 1969.

3. I am the daughter of Daniel Marcucci, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On October 7, 2017, my father passed away from pancreatic cancer. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My dad was closely involved in all of our lives. He was a ballroom dancer in his younger years. He was always the best dancer at weddings and the first person on the dance floor. It was such a joy to have him twirl me around the dance floor. People loved watching him because he exuded a brilliance of spirit, kindness and an incomparable elegance. He influenced me in my dancing career and was always there to support me at recitals, the Ms. Junior America

pageant, and acting auditions to provide encouragement. "You can do this," he'd say as he cheered me on. My relationship with my dad provided me peace; and while he was a man of few words, when he spoke he consistently gave words of wisdom and somehow knew the right thing to say.

6. My dad was always the first person to raise his hand to help anyone in need. Anything my father did, he did with complete conviction. Following the terrorist attacks on September 11, 2001, nobody really knew how toxic the air was, but my dad went to work every day at the Department of Buildings and wanted to help people in any way he could. After 9/11, my dad often said that what people were inhaling in lower Manhattan couldn't be good. It wasn't long after 9/11 that I realized my dad's health and energy levels had changed for the worse. He developed a persistent cough, was having difficulty breathing and had a hard time digesting food. My dad loved to golf, and we would often go to tournaments together. I remember one time at the Augusta Country Club, we had to call an ambulance because he almost choked. It wasn't an issue with the food, but rather his digestive system. We soon found out that he suffered from GERD, combined with coughing and respiratory problems.

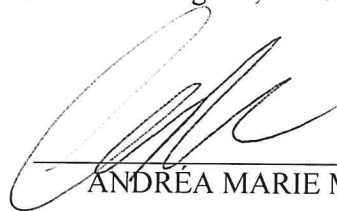
7. I knew my dad's illness was becoming serious when his energy level dropped, he appeared ashen, gaunt, and thin. He also complained about backaches, which I later learned was a common symptom of pancreatic cancer. I was so distraught to learn that my dad was diagnosed with pancreatic cancer in 2015. Then, when we found out that the cancer had spread to his liver and surgery was not an option. I was inconsolable. My dad was trying to keep it together for my mother. When he was undergoing a biopsy on his liver, my mother had suffered a stroke. I was speaking to her over FaceTime as it happened. This was such an awful, stressful time because not only was I witnessing my father's condition manifest, but I had to see my mother literally having a stroke while we were speaking over FaceTime. Because I could see what was happening, I was able to immediately call an ambulance for her. These events added to my stress because now both of my parents were in the hospital at the same time.

8. Attending my father's chemotherapy treatments with both my parents was one of the most emotional experiences I can remember. On one occasion, upon seeing a man in a wheelchair who had lost so much weight that he looked to be only 50 pounds, my dad said to my mom, "I don't want to be frail, and skinny, and weak, and in a wheelchair." Unfortunately,

that's exactly what he became. After being struck by cancer, my dad was in a wheelchair, he couldn't walk, and could no longer read, which he loved to do. My dad was a lifelong learner who took classes all the time. He loved his family unconditionally. One of his greatest pleasures was playing with his grandchildren, and as his condition worsened, he was robbed of that.


9. My dad's cancer also had a disastrous impact on all of us financially. My father was the breadwinner and my mother became concerned about money. On a personal level, since I had recently founded a company, it was very difficult to keep my startup afloat while going with my dad to treatments. It was hard to concentrate and keep up with my responsibilities, which led to the closure of my business.

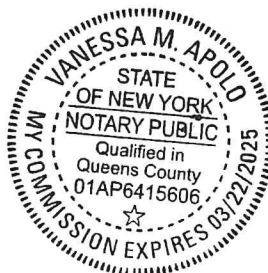
10. I feel like our family went through 9/11 twice. First was witnessing the tragedy of the planes striking the towers, and the second was upon learning of my father's cancer and that it was related to the toxins that resulted from the attacks. We have been going through 9/11 for a long time, along with so many people. My father would still be here had it not been for 9/11. I'm so infuriated that my dad had to go through a level of suffering that no human being should go through. And he did suffer. He couldn't walk or eat and needed help with even basic things. And my mom, even with her own issues, was his immediate caregiver, and she suffered right alongside him.



ANDRÉA MARIE MARCUCCI

Sworn to before me this
25 day of April, 2022



Notary Public

Daniel M. Marcucci

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

AFFIDAVIT OF
DANIEL M. MARCUCCI

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF WESTCHESTER)

DANIEL M. MARCUCCI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1007 Palmer Avenue, Mamaroneck, New York, 10543.

2. I am currently 57 years old, having been born on March 19, 1965.

3. I am the son of Daniel Marcucci, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father died from pancreatic cancer on October 7, 2017. It was determined by the World Trade Center Health Program that my father's illness was causally connected to his exposure to the toxins in the air resulting from the September 11, 2001 terrorist attacks.

5. I had a great relationship with my dad. He was always an active parent who never missed any of my baseball games. As a child, I was in a band and my dad never missed a chance to see me play in concerts downtown. He was a great man, a man of faith, who was always there for me. Since my father's background was in construction, in addition to working on my brother's home, my dad also made frequent trips to Westchester to help with renovations

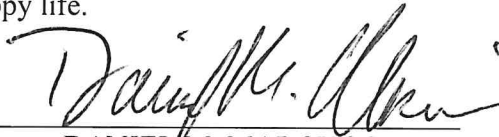
to my home in 2016. We spent a lot of time together before he became ill. We played golf, went out to movies, and shared meals together as a family at every chance.

6. My father was working in the area of the World Trade Center on September 11, 2001. At the time, he was not provided with masks or protective gear. My father commented at the time that the firemen were providing incredible services, but he thought that more demolition and building experts were needed to take over some of the cleanup work.

7. I learned of my dad's illness in 2015 from my mom. My dad didn't want to tell us directly because he didn't want his family to worry. Dad was a strong, proud man who asked us not to talk about it. After hearing about his increased PSA levels, I became more involved in his care and would stay with him as he underwent chemotherapy. I'm still devastated by what happened to my father, but I know he's in heaven now watching over me and my family.

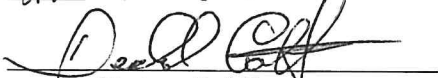
8. It was heartbreaking to see my dad, a man who was always strong and healthy, become incapable of some basic tasks, including driving, and later not being able to walk. What was really rough was calling my parents' house and not being able to even speak to my dad because he was too weak to even pick up the phone. Even though he was going through so much pain, he never voiced too many complaints and always tried to project as much positivity and strength as possible for his family. He was my hero for that.

9. My father was the first in his family to develop cancer. If my father was in a different line of work that hadn't required his presence in the World Trade Center area, I believe he would still be here with us, living an active and happy life.


DANIEL M. MARCUCCI

Sworn to before me this

11 day of April, 2022


Notary Public

DONALD GOLDSMITH
Notary Public, State of New York
No. 01GO5021034
Qualified in Westchester County
Commission Expires Dec. 6, 2025

Mark Marcucci

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF
MARK MARCUCCI**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF NASSAU)

MARK MARCUCCI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 560 Hunt Lane, Manhasset, New York, 11030.

2. I am currently 59 years old, having been born on October 19, 1962.

3. I am the son of Daniel Marcucci, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On October 7, 2017, my father died from pancreatic cancer. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father was a very involved parent to me as well as my younger brother and sister. When we played little league, he would always attend our baseball games. I have vivid memories of my dad pitching in at little league games, and he would catch for me up to 16 years old. In fact, even when an umpire failed to show up, my dad would jump in and take his place. My dad always tried to bring the family together for events and holidays and was very focused

on the family. After I had my own kids, my dad became very involved in their life and was proud to be a grandfather, never failing to attend their school events, including concerts and sporting events. He was an avid photographer and became the de-facto photographer for his grandchildren's little league teams.

6. My father worked as an inspector for New York City's Department of Buildings (DOB). A few weeks after the September 11th attacks, my dad was activated to work on the facade team, inspecting damage to buildings in the vicinity of the World Trade Center. He continued in this role up through November, 2003. After that work concluded, my dad continued to work for the DOB in lower Manhattan for the next ten years.

7. Following my dad's 9/11 exposure, I first noticed him becoming ill in about 2004. He started complaining about sinus issues. Years later, in 2009, my dad was diagnosed with prostate cancer. During this time, he suffered from gastroesophageal reflux disease (GERD) as well as upper respiratory ailments. Our worst fears were realized in 2015, when my dad was diagnosed with pancreatic cancer. As a result of the prostate cancer, my dad's PSA levels were monitored. In 2015, they escalated to the 7s and 9s, which led to a recommendation for a further CAT scan. In early summer of 2015, a biopsy was done at St. Francis Hospital that identified the malignancy of growths in his abdomen. Sadly, while the doctors had scheduled my dad for surgery, a subsequent CAT scan revealed that the pancreatic cancer had spread to his liver and the surgery was canceled. Shortly afterward, my dad began chemotherapy in July, 2015. It should be noted that we don't have a history of cancer in our family and my dad's BRCA gene test was negative. This, combined with my knowledge of his work in the exposure zone, makes me certain my dad's cancer was caused by the 9/11 attacks.

8. Seeing my dad suffer through his diagnosis, chemotherapy, and other medical procedures created an especially hard time for us. It was particularly frustrating to feel somewhat optimistic that my father's condition would improve after a surgery only to have those hopes dashed after the procedure was cancelled. I learned of the cancellation after my dad left a voicemail, in which he sounded so scared. The message only said to call right away but I knew what he meant, that the doctors had felt the cancer was inoperable. Knowing my dad was so active before the chemotherapy and seeing the changes in his energy level was especially upsetting. In March 2007, I purchased a home in Hampton Bays. Since the home needed

extensive renovations, my father volunteered to take on the construction work and act as a project manager overseeing another contractor. Despite his diagnosis in 2009 and subsequent medical tests, my father started to work on the house in September 2013 through May 2014. Despite the 85-mile distance, my dad would make the trip several times a week to continue the work on a detailed level and help my family with the home.

9. My dad's diagnosis was so heartbreaking, and it was painful to watch the debilitating effects of his condition. My father was a robust, strong, and incredibly active person. Despite being in a heavily physical vocation his entire life, as far as I know, he never took a sick day. To see how my dad's 9/11 exposure took over and consumed his body and ultimately killed him was gut-wrenching for all of us. Even though my dad suffered from cancer over the course of many years, there's no question that the 9/11-related toxins he took into his body were responsible for his cancers, respiratory ailments, and esophageal reflux. For me personally, it was devastating to witness my father become so ill with various ailments. Losing someone I so loved and admired was a tremendous loss to me and has robbed my children of a wonderful grandfather.



MARK MARCUCCI

Sworn to before me this
20 day of April, 2022



Notary Public

WOOCHUL KIM
Notary Public, State of New York
No. 01K16232939
Qualified in Nassau County
Commission Expires Dec 20, 20 22